

St. Louis County (WP)
AmerenUE-Meramec Power Plant
MO-0000361



Jeremiah W. (Jay) Nixon, Governor • Mark N. Templeton, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

April 29, 2009

Steven S. Weiss, Envir. Scientist
Ameren Services
1901 Chouteau Avenue
P. O. Box 66149, MC 602
St. Louis, MO 63166-6149

Dear Mr. Weiss:

On April 22, 2009, Mr. Scott Hoffman of the St. Louis Regional Office conducted a water pollution inspection of the wastewater, storm water, and cooling water discharges from the AmerenUE - Meramec Power Plant to determine compliance with federal and Missouri water pollution regulations.

Findings of Mr. Hoffman's inspection are detailed in the enclosed inspection report.

Should you have any questions about your inspection report, please call Mr. Hoffman at (314) 416-2960 or you may write him at the St. Louis Regional Office, 7545 S. Lindbergh Blvd., Suite 210, St. Louis, MO 63125.

Thank you for your cooperation.

Sincerely,

ST. LOUIS REGIONAL OFFICE

A handwritten signature in black ink that reads "Mike Struckhoff".

Mike Struckhoff
Regional Director

MS/RSB/jh

Enclosures

c: Catherine Hodges, Water Pollution Branch-Enforcement ✓
St. Louis County Health Department

RECEIVED
2009 MAY -4 PM 12:47
WATER PROTECTION PROGRAM

INSPECTION REPORT OF THE AMEREN UE-MERAMEC POWER PLANT

AmerenUE-Meramec Power Plant
8200 Fine Road
St. Louis, MO 63129
NPDES Permit #MO-0000361

INTRODUCTION:

On April 22, 2009, Mr. Scott Hoffman of the St. Louis Regional Office conducted an inspection of the wastewater, storm water, and cooling water discharges from the AmerenUE-Meramec Power Plant to determine compliance with federal and state water pollution standards and regulations. Mr. Hoffman was accompanied on the inspection by Mr. Steven Weiss, Environmental Scientist, AmerenUE Services.

The inspection included a review of our department files and Discharge Monitoring Reports (DMRs) from the facility to assess compliance status with the facility's State (Water) Operating Permit. Paperwork and reports reviewed were from the period January – December 2008. The facility's operating permit expired in May 2005 and a renewal application was submitted to the department as required at that time. The facility's new wastewater operating permit is under review and is awaiting final approval/issuance from the permit section of the Water Pollution Control Program in Jefferson City.

FINDINGS AND COMMENTS:

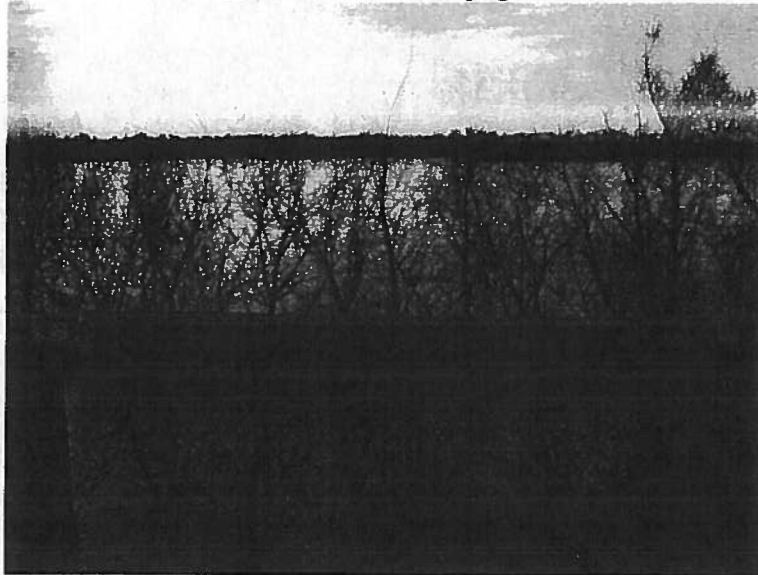
1. Reports indicated that the Meramec Plant was meeting its permit limits/requirements except for Exception Reports in July and September 2008 for overtopping of the bottom ash pond, and in April 2008 for exceeding Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS), and pH from the WWTF. All problems were identified, fixed and/or resolved quickly.

DMRs for the non-contact cooling water (Outfalls #1 & 2) indicated that the effluent was in compliance with permit limits. Observation of the receiving river showed no visible adverse effects of/from the effluent. Effluent pipes were partially submerged and were visible.

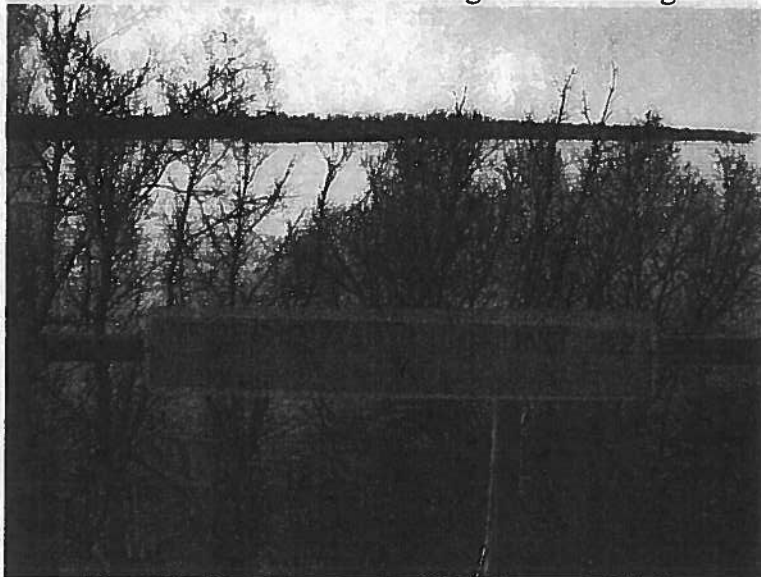
DMRs for the ash pond discharge and storm water (Outfall #3) indicated that the effluent from this discharge was also in compliance with permit limits for the period reviewed. The effluent appeared clear to very light brown, and the receiving stream was clear showing no adverse effects from the effluent. Since the summer of 2000, the pond has only received bottom ash, so accumulation of cenospheres is not a problem.

DMRs for the extended aeration wastewater plant (Outfall #4) showed that the effluent was also in compliance with permit limits for the period reviewed except for exceedances for BOD, TSS, and pH in April 2008. The exceedances were caused by an unknown amount of lime slurry being dumped down a toilet and drains emptying into the WWTF. Contract maintenance personnel were instructed not to dump slurry into anything that drains into the WWTF. At the time of the inspection, the mixed liquor was gray-brown with no foam. There was little to no floc in the clarifier. The effluent weir had been cleaned, and there appeared to be adequate aeration and mixing in the aeration chamber. While the plant appeared to be operating correctly, attention should be given to the operation and maintenance of the treatment plant until closed.

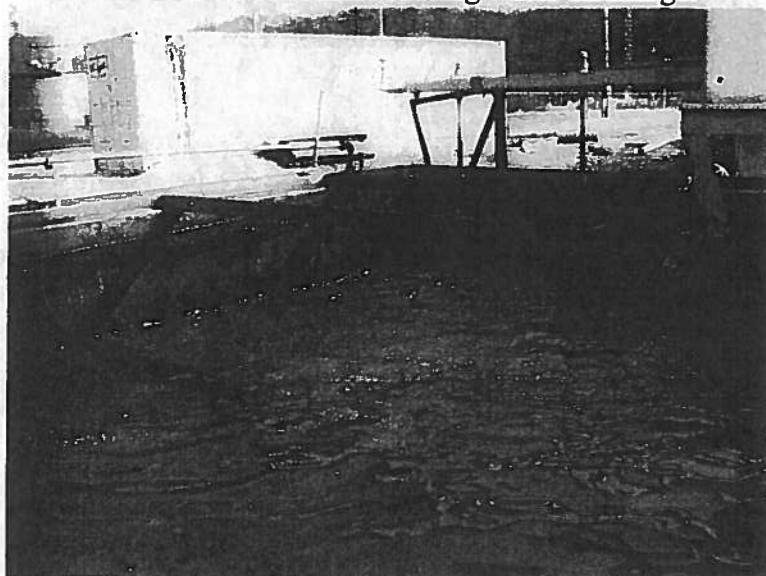
DMRs for the emergency overflow (Outfall #5) show that there was no discharge during the period reviewed and there was no discharge during the inspection.



Outfall #2: non-contact cooling water discharge.



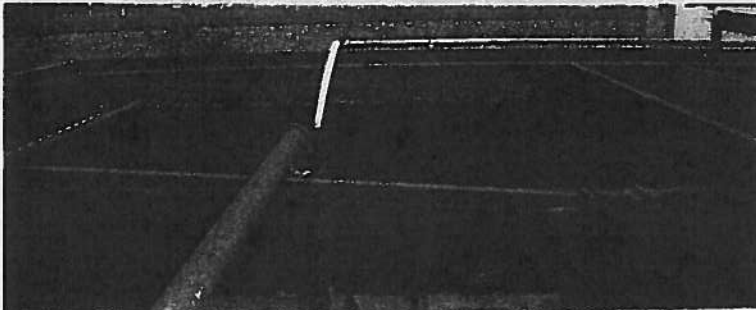
Outfall #1: noncontact cooling water discharge.



Outfall #4: WWTF.



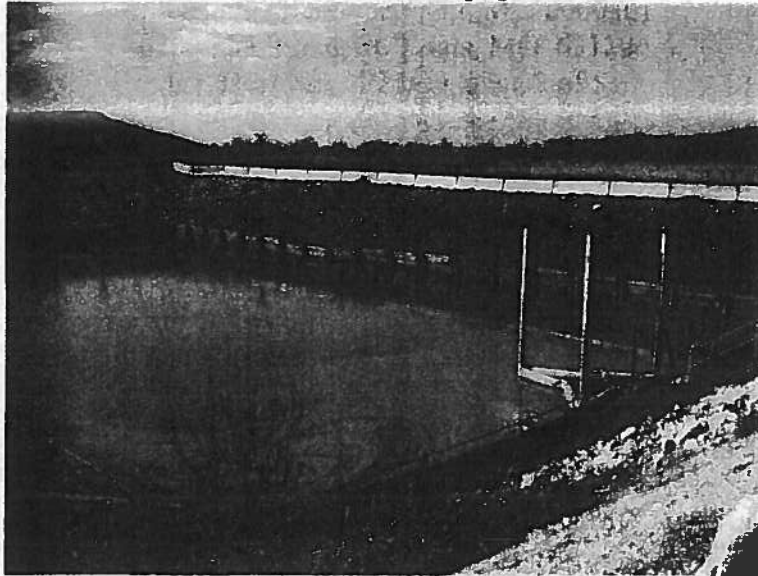
WWTF



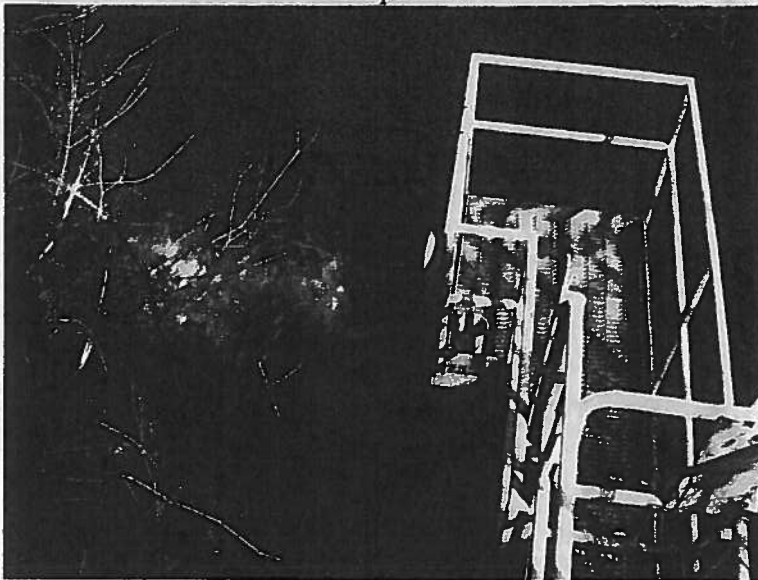
WWTF



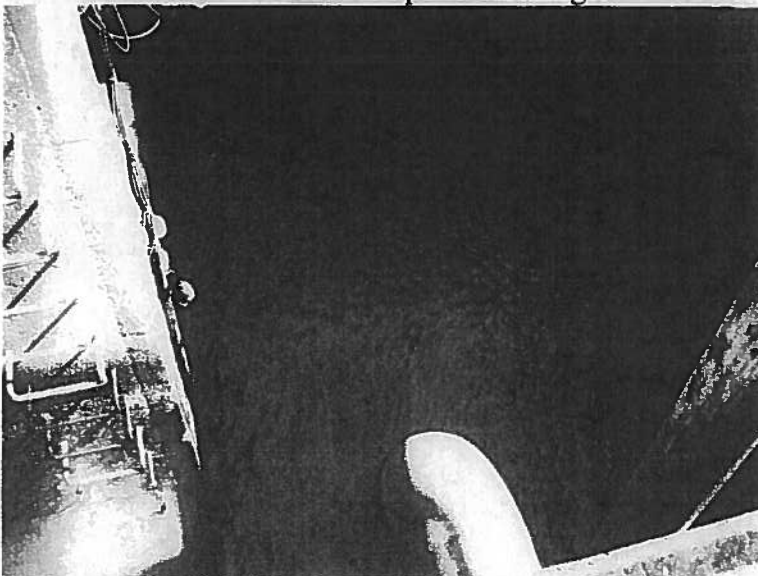
Wastewater piped underground from this "well" to Mississippi River.



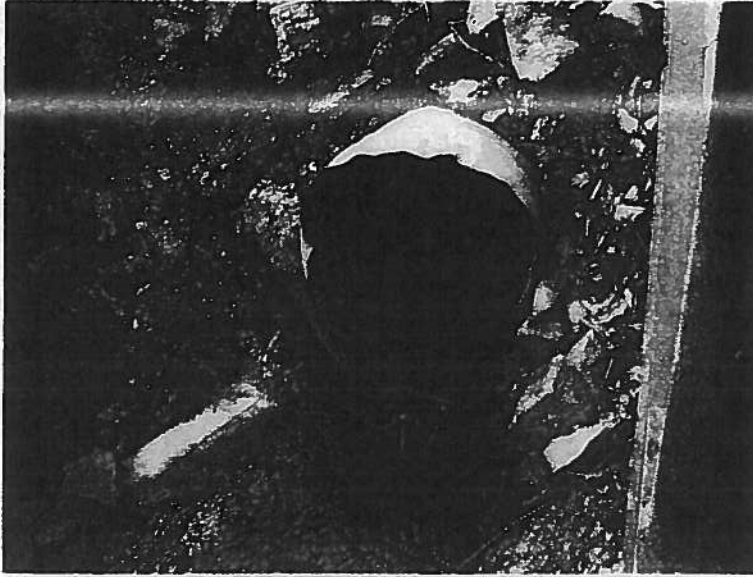
Ash pond.



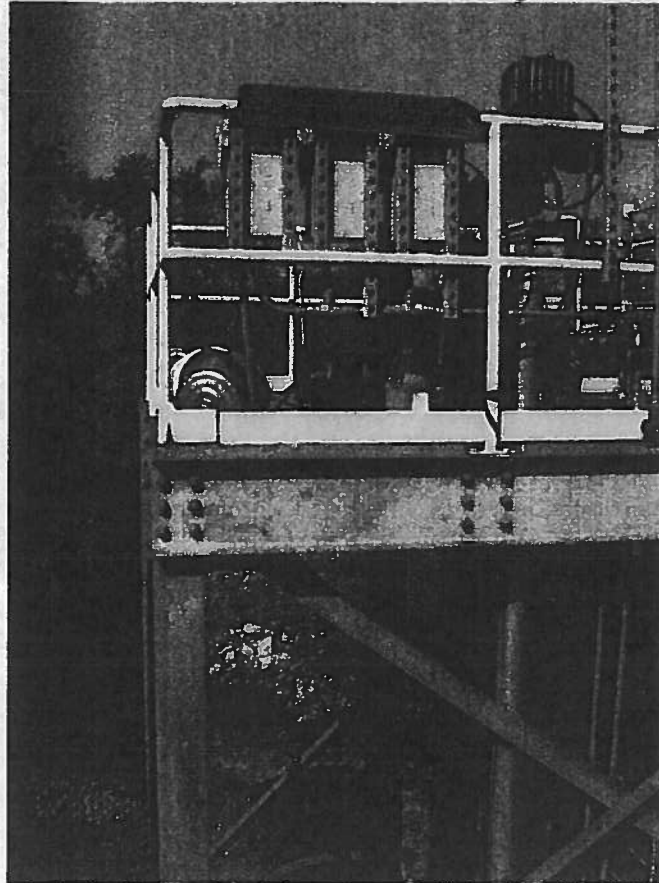
Outfall #003: Ash pond discharge.



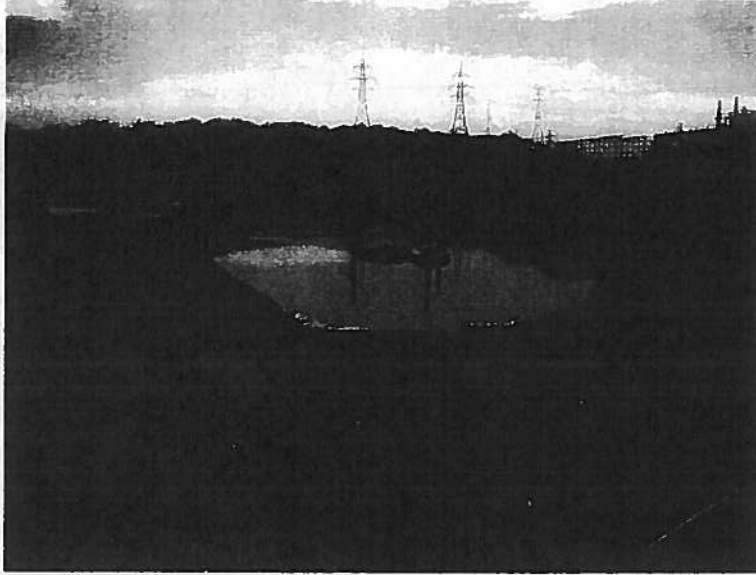
Outfall #6: Caisson sump and screen wash discharge.



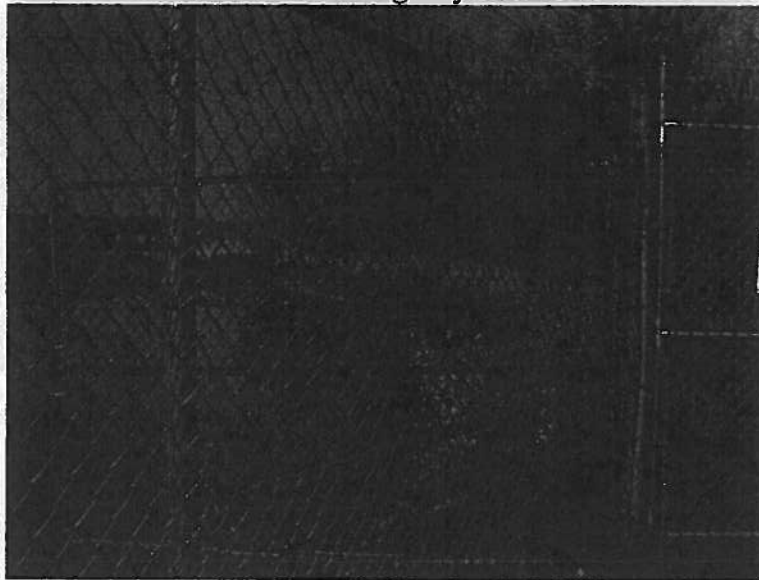
Outfall #7: stormwater discharge.



Outfall #9: Fly ash pond discharge.



Outfall #5: Emergency overflow.



Lower ash pond overtopped in July and September 2008 due to record rainfall in 2008.

APPENDIX 1
DATA INPUT SHEET FOR WQIS
INSPECTIONS

Facility ID: 886
Permit Number: MO-0000361 Outfall(s): 1, 2, 3, 4, 5, 6, 7, 8, 9
Facility Name: Awaru WE - Mawmaw Plant
Legal Description: SW 1/4, Sec 3 T42N, R6E River Reach No: 07140101-070004 ±
City Name: St. Louis County: St. Louis ROP: St. Louis 07140102-08a
Inspection Date: 4/22/09 WQIS Input Date: _____ Inspector: R. Scott Hoffman

Type of Inspection (check only one):

- CS ☐ Comprehensive inspection, sample taken (I & E Manual's Class 3 inspection)
CE ☒ Comprehensive inspection, no sample taken (I & E Manual's Class 3 inspection)
AI ☐ Abbreviated inspection (I & E Manual's Class 2 inspection)
CP ☐ Inspection or investigation in response to a complaint

INSPECTION DATA (Check all that apply)

CO ☒ Facility in compliance

NCO ☐ Facility not in compliance

- NOCP ☐ No construction permit
CTOP ☐ Certified operator required, but not employed
ELV ☐ Facility not meeting effluent limits based on DMRs or recent sampling
BYP ☐ Evidence of bypassing at facility or in collection system
NOLA ☐ Class I facility is operating without the required LOA/permit
NOPT ☐ Facility is discharging without a permit (includes land application facilities)
SCV ☐ Schedule of Compliance not being met
REV ☐ Reporting (e.g. DMR) or other standard conditions not being met
SDV ☐ Sludge disposal standard violation
SIC ☐ Sludge or solids were observed in creek or around outfall
SOP ☐ Stream has other observable problems due to this discharge
SWOP ☐ No stormwater outfalls permitted

- HBFB ☐ Holding basin is within one foot of overflow from a no-discharge system
LL ☐ Lagoon is leaking based on geologic evaluation or water balance information
LAV ☐ Wastewater irrigation problems
SDP ☐ Sludge disposal problems
PTV ☐ Pretreatment problems
OMP ☐ Operation and maintenance problems
SNO ☐ Stream not observed during inspection
OT ☐ Other (specify)

COMPLIANCE TRACKING (Complete all that apply)

(year / month / day)

- NOVR1 ☐ Notice of Violation issued on _____ / _____ / _____
RRER2 ☐ Facility owner directed to submit DMRs, engineering report, plans and specs., construction permit, etc. by: _____ / _____ / _____
FRCR3 ☐ Facility owner directed to return to compliance by _____ / _____ / _____
OTRR4 ☐ Other; describe below; response date is: _____ / _____ / _____
VIR5 ☐ Follow-up visit/inspection scheduled for: _____ / _____ / _____

St. Louis County (WP)
AmerenUE-Meramec Power Plant
MO-0000361

WENF Rec'd JUN 30 2006



Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

April 3, 2006

Steven S. Weiss, Envir. Scientist
Ameren Services
One Ameren Plaza
1901 Chouteau Avenue
P. O. Box 66149, MC 602
St. Louis, MO 63166-6149

Dear Mr. Weiss:

On March 15, 2006, Mr. Scott Hoffman of the St. Louis Regional Office conducted a water pollution inspection of the wastewater, storm water, and cooling water discharges from the AmerenUE Meramec Power Plant to determine compliance with federal and Missouri water pollution regulations.

Findings of Mr. Hoffman's inspection are detailed in the enclosed inspection report.

Should you have any questions about your inspection report, please call Mr. Hoffman at (314) 416-2960 or you may write him at the St. Louis Regional Office, 7545 S. Lindbergh Blvd., Suite 210, St. Louis, MO 63125.

Thank you for your cooperation.

Sincerely,

ST. LOUIS REGIONAL OFFICE

A handwritten signature in black ink, appearing to read "Mike Struckhoff".

Mike Struckhoff
Regional Director

MS/RSH/jh

A handwritten signature in black ink, appearing to read "MS/RSH/jh".
Enclosures

c: Water Pollution Branch
Catherine Hodges, Water Pollution Enforcement
St. Louis County Health Department

INSPECTION REPORT OF THE AMEREN UE-MERAMEC POWER PLANT

AmerenUE-Meramec Power Plant
8200 Fine Road
St. Louis, MO 63129
NPDES Permit #MO-0000361

INTRODUCTION:

On March 15, 2006, Mr. Scott Hoffman of the St. Louis Regional Office conducted an inspection of the wastewater, storm water, and cooling water discharges from the AmerenUE-Meramec Power Plant to determine compliance with federal and state water pollution standards and regulations. Mr. Hoffman was accompanied on the inspection by Mr. Steven Weiss, Environmental Scientist, AmerenUE Services.

The inspection included a review of our department files and Discharge Monitoring Reports (DMRs) from the facility to assess compliance status with the facility's State (Water) Operating Permit. Paperwork and reports reviewed were from the period January – December 2005. The facility's operating permit expired in May 2005 and a renewal application was submitted to the department as required at that time. The facility's new wastewater operating permit is currently out for public comment and is awaiting final review/issuance from the permit section of the Water Pollution Control Program in Jefferson City.

FINDINGS AND COMMENTS:

DMRs for the non-contact cooling water (Outfalls 001 & 002) indicated that the effluent was in compliance with permit limits. Observation of the receiving river showed no visible adverse effects off/from the effluent. The effluent pipe was not submerged and was visible.

DMRs for the ash pond discharge and storm water (Outfall 003) indicated that the effluent from this discharge was also in compliance with permit limits for the period reviewed. The effluent appeared clear and the receiving stream was clear with both showing no adverse effects from the effluent. Since the summer of 2000, the pond has only received bottom ash, so accumulation of cenospheres is not a problem.

DMRs for the extended aeration wastewater plant (Outfall 004) showed that the effluent was also in compliance with permit limits for the period reviewed. At the time of the inspection, the mixed liquor was gray brown with no foam. There was also some small floc in the clarifier. The effluent weir had a few spots of algae that need to be cleaned and there appeared to be adequate aeration and mixing in the aeration chamber. While the plant appeared to be operating correctly, attention should be given to the operation and maintenance of the treatment plant to ensure problems with permit limits do not occur as they did several years ago.

DMRs for the emergency overflow (Outfall 005) show that there was no discharge during the period reviewed and there was no discharge during the inspection.

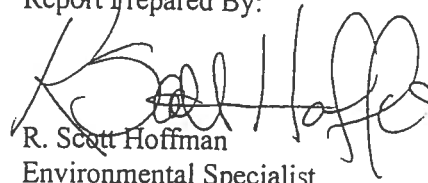
DMRs for the caisson sump and screen wash discharge (Outfall 006) showed that the effluent met permitted limits during the period reviewed. There was no effluent discharging during the inspection.

Per Special Condition #15 of the facility's operating permit, monitoring for storm water discharges from Outfalls 007 & 008 are waived for this permit cycle as long as AmerenUE uses Best Management Practices (BMPs) on these outfalls. If problems occur, monitoring will be re-established by the department. Per the draft permit, AmerenUE will conduct periodic inspections of these outfalls to determine effectiveness of the BMPs.

Lastly, DMRs for the fly ash pond-storm water discharge showed that the effluent was in compliance with permit limits except for one exceedance for Total Suspended Solids (TSS) on July 12, 2005. Additional attention should be given to the operation and maintenance of equipment to prevent any reoccurrence.

Whole Effluent Toxicity (WET) tests for Outfalls 001, 002, 003, & 009 are conducted annually as required.

Report Prepared By:



R. Scott Hoffman
Environmental Specialist
St. Louis Regional Office

Date: 4/3/06

RSH/jh

WENF Rec'd JUN 12 2009



Jeremiah W. (Jay) Nixon, Governor • Mark N. Templeton, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

April 29, 2009

Steven S. Weiss, Envir. Scientist
Ameren Services
1901 Chouteau Avenue
P. O. Box 66149, MC 602
St. Louis, MO 63166-6149

Dear Mr. Weiss:

On April 23, 2009, Mr. Scott Hoffman of the St. Louis Regional Office conducted a water pollution inspection of the wastewater, storm water, and cooling water discharges from the AmerenUE - Rush Island Power Plant to determine compliance with federal and Missouri water pollution regulations.

Findings of Mr. Hoffman's inspection are detailed in the enclosed inspection report.

Should you have any questions about your inspection report, please call Mr. Hoffman at (314) 416-2960 or you may write him at the St. Louis Regional Office, 7545 S. Lindbergh Blvd., Suite 210, St. Louis, MO 63125.

Thank you for your cooperation.

Sincerely,

ST. LOUIS REGIONAL OFFICE

A handwritten signature in black ink that reads "Mike Struckhoff".

Mike Struckhoff
Regional Director

MS/RSH/jh

Enclosures

c: Catherine Hodges, Water Pollution Branch-Enforcement ✓
Jefferson County Health Department
Michael J. Smallwood, Senior Engineer, AmerenUE

RECEIVED
2009 MAY -4 PM 12:47
WATER PROTECTION PROGRAM

INSPECTION REPORT OF THE AMEREN UE-RUSH ISLAND POWER PLANT

Ameren UE-Rush Island Power Plant
100 Big Hollow Road
Festus, MO 63028
NPDES Permit #MO-0000043

INTRODUCTION:

On April 23, 2009, Mr. Scott Hoffman of the St. Louis Regional Office conducted an inspection of the wastewater, storm water, and cooling water discharges from the AmerenUE-Rush Island Power Plant to determine compliance with federal and state water pollution standards and regulations. Mr. Hoffman was accompanied on the inspection by Mr. Steve S. Weiss, and Mr. Dan Wenk, both of AmerenUE Services.

The inspection included a review of our department files and Discharge Monitoring Reports (DMRs) from the facility to assess compliance status with the facility's State (water) Operating Permit. Paperwork and reports reviewed were from the period January 2008 – February 2009. The facility's operating permit was issued in October 2004 and will expire on September 30, 2009. A State Water Pollution Operating Permit renewal application has been submitted and is under review. Reports indicated that the Rush Island plant was meeting its permit limits/requirements except for an Exception Report in March 2008 for a discharge from the clean water gravity filter during maintenance, an Exception Report in November 2008 for a discharge (leak) from #3 Condensate Storage Tank, and an Exception Report in August 2008 for low pH in the effluent from the ash pond. All problems were identified, fixed and/or resolved quickly.

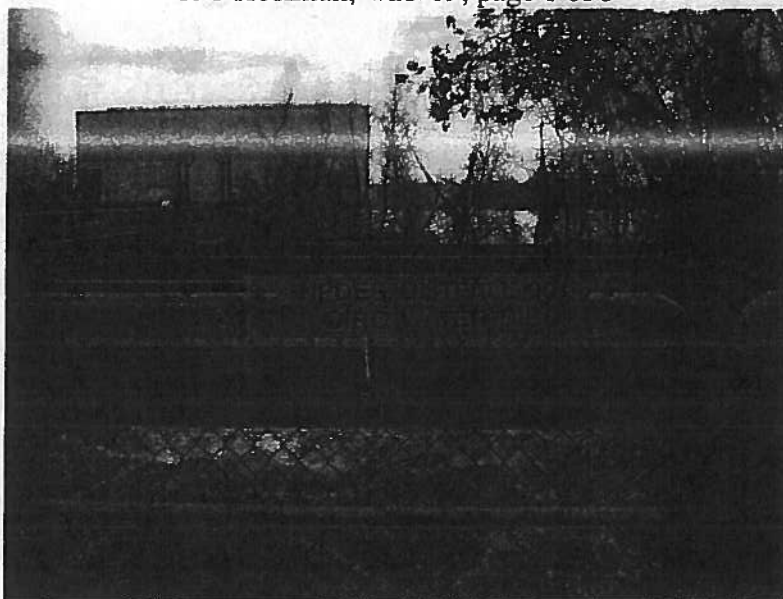
FINDINGS AND COMMENTS:

DMRs for the non-contact cooling water (Outfall #1) indicated that the effluent was in compliance with permit limits for the period reviewed. Observation of the Mississippi River showed no visible adverse effects of/from the cooling water effluent. The water level of the Mississippi River was high due to spring rains. The actual outfall pipe is usually below water (as was the case during the inspection) and could not be observed.

DMRs for the ash pond discharge (Outfall #2) indicated that the effluent from this discharge was also in compliance with permit limits except for an exceedance for low pH noted in August 2008. The discharge valve stuck open causing the CO2 injection system to not shut off during periods of no discharge causing low pH in the discharged effluent. Again, the outfall pipe was under water in the Mississippi River and could not be physically observed.

DMRs for the flow from the sewage treatment plant (Outfall #3) showed that the effluent was also in compliance with permit limits. At the time of the inspection, the mixed liquor was very dark brown with no foam and no odor. The dark color may indicate that the wastewater system's micro-organisms may be stressed. Operators need to ensure that the micro-organisms have enough nutrients and are not poisoned with chemicals to ensure the WWTF can operate as designed until the plant is replaced. A State Construction Permit #22-7685 has been issued to replace the current WWTF. The replacement project has been delayed and will not start until sometime in 2010. Aeration and mixing in the aeration chamber appeared to be operating normally, and effluent weir was free of solids. The effluent is discharged (piped) directly from the treatment plant into the Mississippi River. Due to high water on the river, the actual effluent pipe usually is and was under water. Monitoring samples are taken from the discharge "well" before exiting the wastewater plant (underground) into the Mississippi.

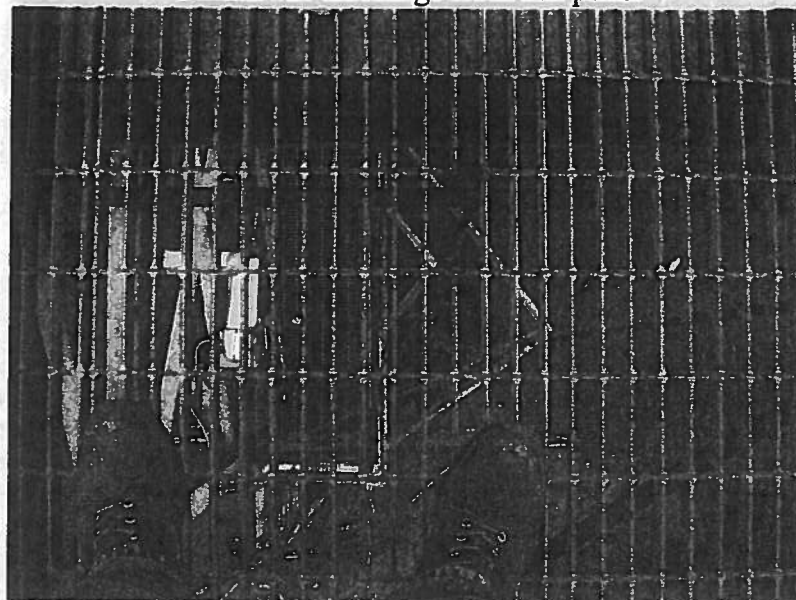
Outfall #4 (storm water outfall) still exists, but does not have a permit limit and is not monitored continuously due to the implementation of Best Management Practices (BMPs) by AmerenUE and minimal risk to the waters of the state. There was no discharge from the outfall during the inspection, and quarterly inspections of this discharge point are conducted and documented as required.



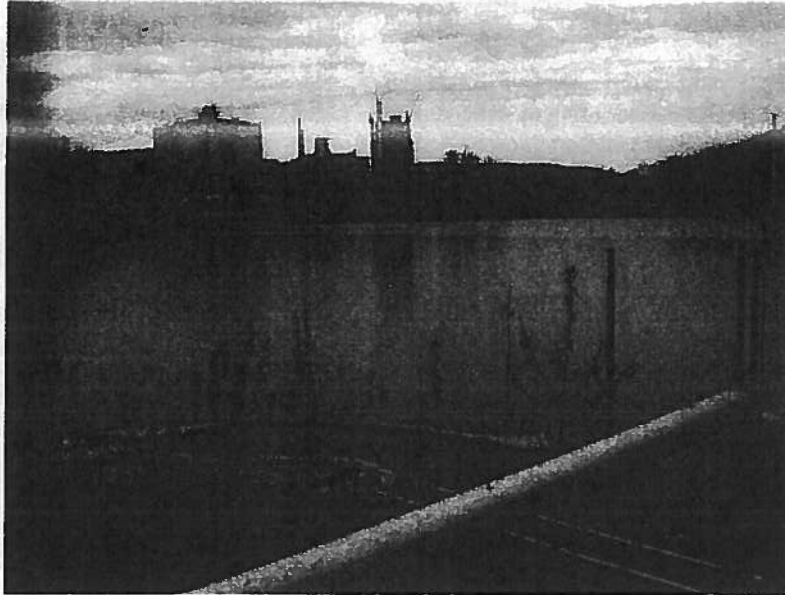
Outfall #1: cooling water discharge.



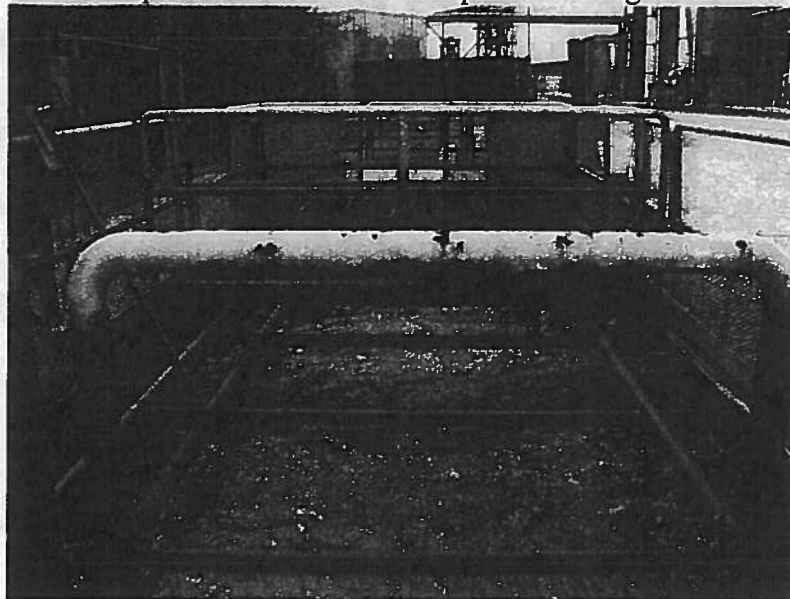
Outfall #2: discharge from ash pond.



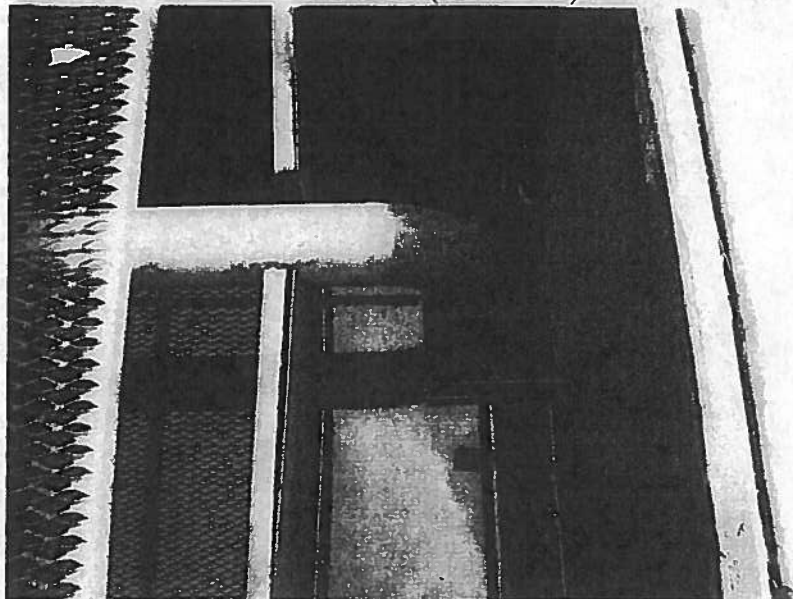
Ash pond discharge under water.



Ash pond w/ Holcim cement plant in background.



Plant's WWTF (Outfall #3).



Wastewater piped underground to Mississippi River.

DATA INPUT SHEET FOR WQIS
INSPECTIONS

Facility ID: 801
Permit Number: AmerauE-Rush Island Plant Outfall(s): 1, 2, 3, 4
Facility Name: →
Legal Description: NE 1/4, Sec 5 T39N, R7E River Reach No: 07140101-230001
City Name: Festus County: Jefferson ROP: St. Louis
Inspection Date: 4/23/09 WQIS Input Date: _____ Inspector: R. Scott Hoffman

Type of Inspection (check only one):

- CS _____ Comprehensive inspection, sample taken (I & E Manual's Class 3 inspection)
CE ☒ Comprehensive inspection, no sample taken (I & E Manual's Class 3 inspection)
AI _____ Abbreviated inspection (I & E Manual's Class 2 inspection)
CP _____ Inspection or investigation in response to a complaint

INSPECTION DATA (Check all that apply)

CO ☒ Facility in compliance

NCO _____ Facility not in compliance

- NOCP _____ No construction permit
CTOP _____ Certified operator required, but not employed
ELV _____ Facility not meeting effluent limits based on DMRs or recent sampling
BYP _____ Evidence of bypassing at facility or in collection system
NOLA _____ Class I facility is operating without the required LOA/permit
NOPT _____ Facility is discharging without a permit (includes land application facilities)
SCV _____ Schedule of Compliance not being met
REV _____ Reporting (e.g. DMR) or other standard conditions not being met
SDV _____ Sludge disposal standard violation
SIC _____ Sludge or solids were observed in creek or around outfall
SOP _____ Stream has other observable problems due to this discharge
SWOP _____ No stormwater outfalls permitted

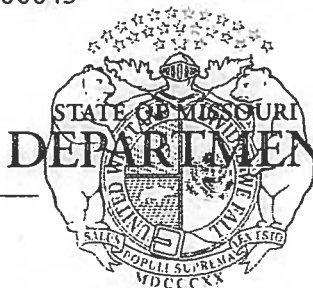
- HBF _____ Holding basin is within one foot of overflow from a no-discharge system
LL _____ Lagoon is leaking based on geologic evaluation or water balance information
LAV _____ Wastewater irrigation problems
SDP _____ Sludge disposal problems
PTV _____ Pretreatment problems
OMP _____ Operation and maintenance problems
SNO _____ Stream not observed during inspection
OT _____ Other (specify)

COMPLIANCE TRACKING (Complete all that apply)

(year / month / day)

- NOVR1 _____ Notice of Violation issued on _____ / _____ / _____
RRER2 _____ Facility owner directed to submit DMRs, engineering report, plans and specs., construction permit, etc. by: _____ / _____ / _____
FRCR3 _____ Facility owner directed to return to compliance by _____ / _____ / _____
OTRR4 _____ Other; describe below; response date is: _____ / _____ / _____
VIR5 _____ Follow-up visit/inspection scheduled for: _____ / _____ / _____

Jefferson County (WPC)
AmerenUE-Rush Island Power Plant
MO-0000043



Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

June 16, 2008

Mr. Steven S. Weiss, Environmental Scientist
Ameren Services
One Ameren Plaza
1901 Chouteau Avenue
P. O. Box 66149, MC 602
St. Louis, MO 63166-6149

Dear Mr. Weiss:

On June 11, 2008, Mr. Scott Hoffman of the St. Louis Regional Office conducted a water pollution inspection of the wastewater, storm water, and cooling water discharges from the AmerenUE Rush Island Power Plant to determine compliance with federal and Missouri water pollution regulations.

Findings of Mr. Hoffman's inspection are detailed in the enclosed inspection report.

Should you have any questions about your inspection report, please call Mr. Hoffman at (314) 416-2960 or you may write him at the St. Louis Regional Office, 7545 S. Lindbergh Blvd., Suite 210, St. Louis, MO 63125.

Thank you for your cooperation.

Sincerely,

ST. LOUIS REGIONAL OFFICE

for
Mike Struckhoff
Regional Director

MS/RSH/sb

Enclosures

c. Catherine Hodges, Water Pollution Branch-Enforcement
Jefferson County Health Department
Michael J. Smallwood, Senior Engineer, AmerenUE

RECEIVED
2008 JUN 20 AM 11:51
WATER PROTECTION PROGRAM

INSPECTION REPORT OF THE AMEREN UE-RUSH ISLAND POWER PLANT

Ameren UE-Rush Island Power Plant
100 Big Hollow Road
Festus, MO 63028
NPDES Permit #MO-0000043

INTRODUCTION:

On June 11, 2008, Mr. Scott Hoffman of the St. Louis Regional Office conducted an inspection of the wastewater, storm water, and cooling water discharges from the AmerenUE-Rush Island Power Plant to determine compliance with federal and state water pollution standards and regulations. Mr. Hoffman was accompanied on the inspection by Mr. Steve S. Weiss, Environmental Scientist of AmerenUE Services.

The inspection included a review of our department files and Discharge Monitoring Reports (DMRs) from the facility to assess compliance status with the facility's State (water) Operating Permit. Paperwork and reports reviewed were from the period April 2007 – April 2008. The facility's operating permit was issued in October 2004 and will expire on September 30, 2009.

FINDINGS AND COMMENTS:

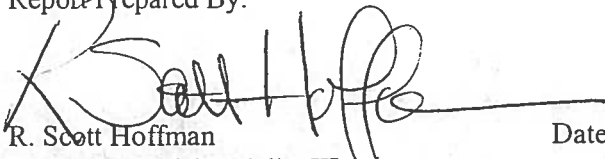
DMRs for the non-contact cooling water (Outfall 001) indicated that the effluent was in compliance with permit limits for the period reviewed. Observation of the Mississippi River showed no visible adverse effects of/from the cooling water effluent. The water level of the Mississippi River was very high due to continuing record rains, and as such, the actual outfall pipe was below water and could not be physically observed.

DMRs for the ash pond discharge (Outfall 002) indicated that the effluent from this discharge was also in compliance with permit limits for the period reviewed. Again, the outfall pipe was under water in the Mississippi River and could not be physically observed.

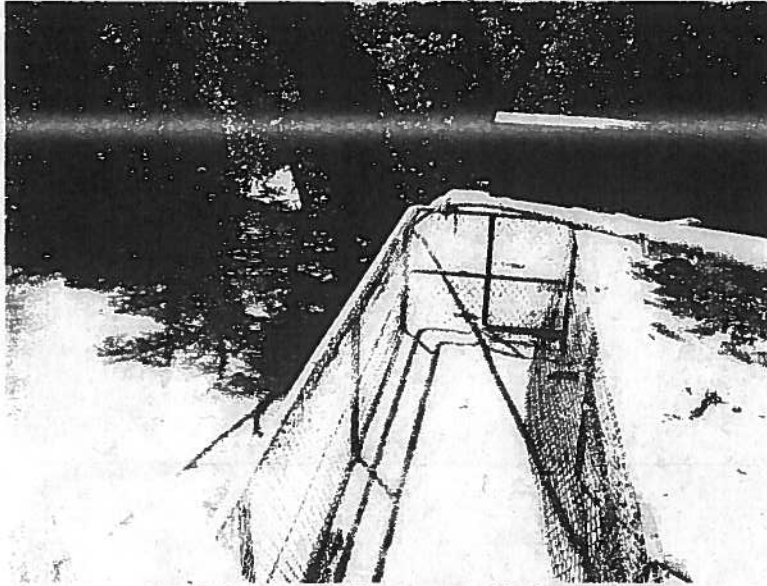
DMRs for the flow from the sewage treatment plant (Outfall 003) showed that the effluent was also in compliance with permit limits. At the time of the inspection, the mixed liquor was light brown with a little foam and a slight odor. The light color and odor may indicate that the wastewater system's micro-organisms may be stressed. On-site operators need to monitor the system daily to ensure that the system continues to operate properly and meet permit effluent limits. This wastewater system is scheduled to be replaced this year. Design of the new system is currently under way. AmerenUE needs to apply for a construction permit with the department before any construction begins. There was also a small amount scum in the clarifier, and there appeared to be adequate aeration and mixing in the aeration chamber. The effluent weir was free of solids. The effluent is discharged directly from the treatment plant into the Mississippi River. Due to high water on the river, the actual effluent pipe was and usually is under water. Because of this, monitoring samples are taken from the discharge "well" before exiting the wastewater plant into the Mississippi.

Outfall 004 (storm water outfall) still exists, but does not have a permit limit and is not monitored continuously due to the implementation of Best Management Practices (BMPs) by AmerenUE and minimal risk to the waters of the state. There was no discharge from the outfall during the inspection. Quarterly inspections of this discharge point are conducted and documented.

Report Prepared By:


R. Scott Hoffman
Environmental Specialist III
St. Louis Regional Office
RSH/

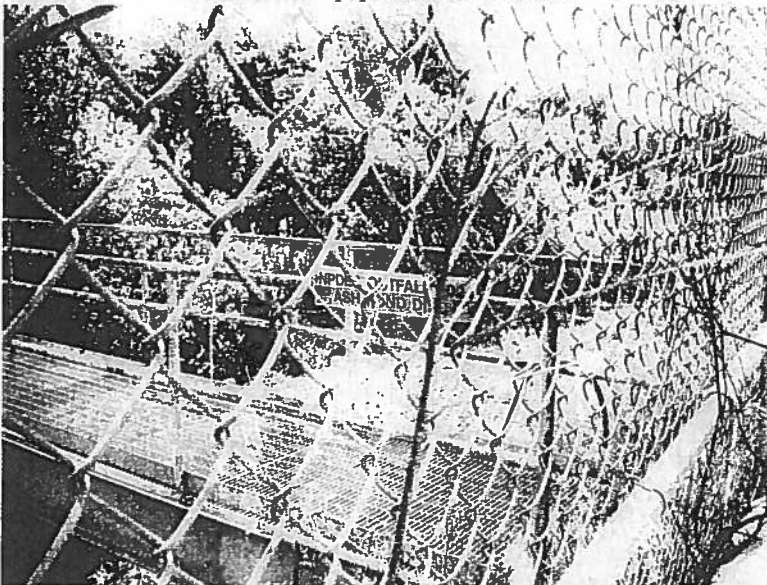
Date: June 11, 2008



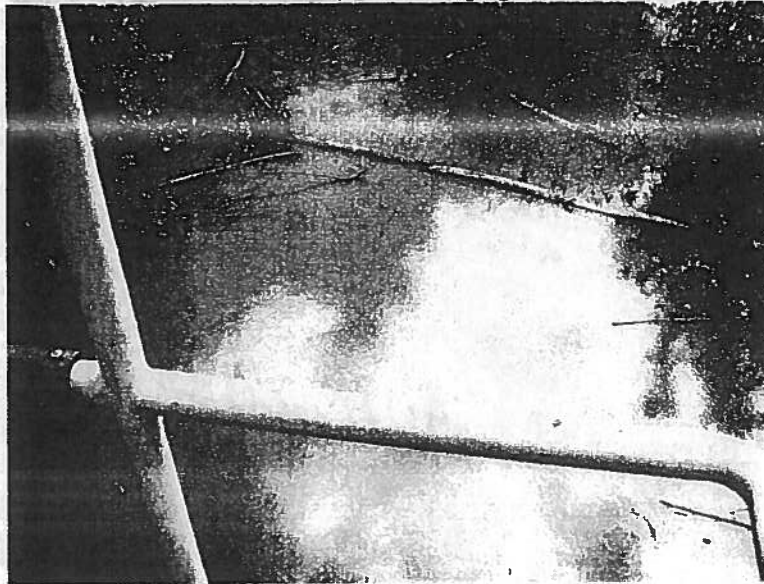
Outfall #1: Cooling water discharge...



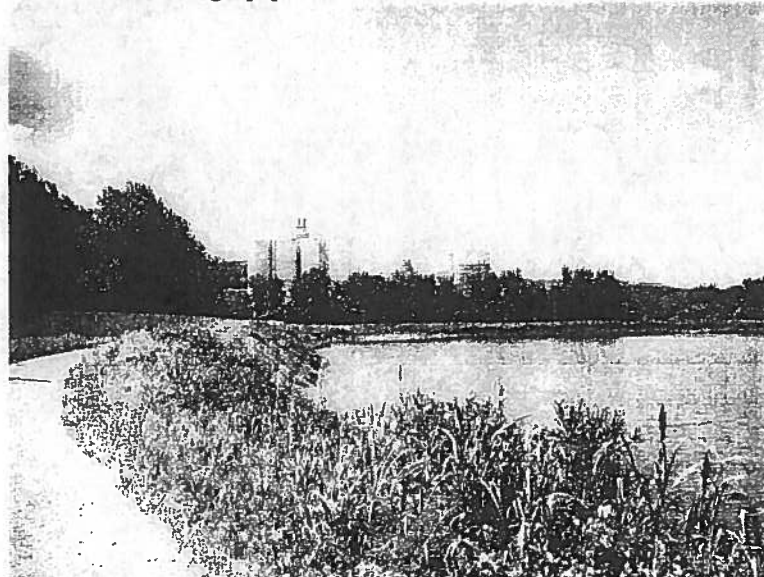
Outfall #1 pipe under water...



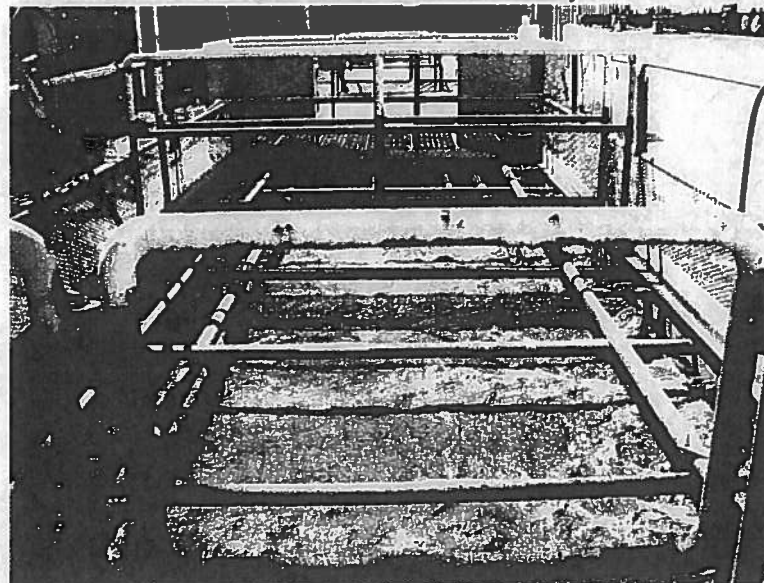
Outfall #2: Discharge from ash pond



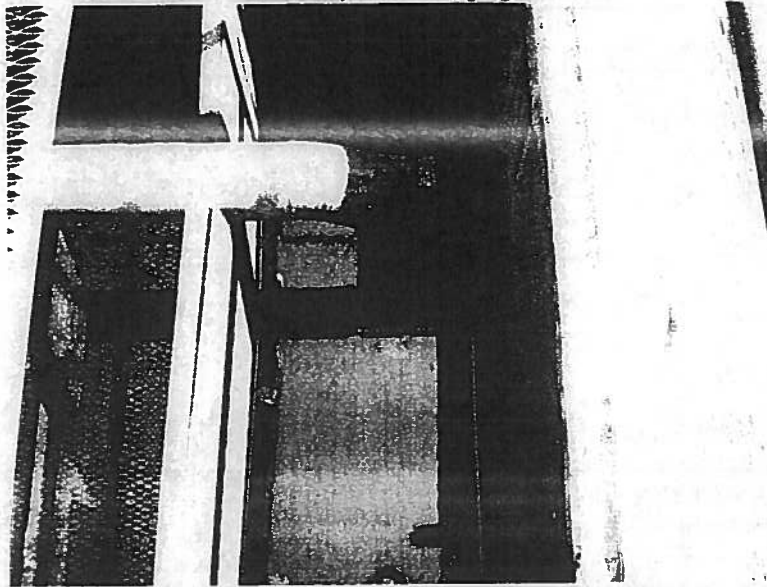
Discharge pipe for Outfall #2 under water...



View of ash pond w/ Holcim plant in background. Holcim's cement plant right next door to Ameren's Rush Island Facility.



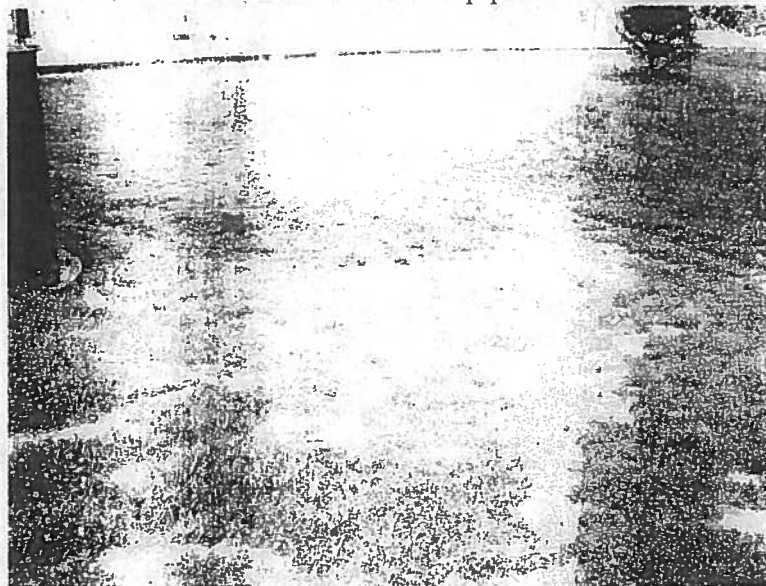
Plant's WWTF...



Samples for/from WWTF taken by dip stick in "well" before wastewater is piped underground to Mississippi River.



Outfall #4 for stormwater is pipe below trees.



Two (2) stormwater inlets draining to outfall #4 are painted green—flows reduced by BMPs.

DATA INPUT SHEET FOR WQIS
INSPECTIONS

Facility ID: 001

Permit Number: MO-0000043 Outfall(s): 001, 002, 003, 004

Facility Name: AmerauUE Rush Island Plant

Legal Description: NE 1/4, Sec 5 T39N R7E River Reach No: 07140101-230001

City Name: Festus County: Jefferson ROP: St. Louis

Inspection Date: 6/11/08 WQIS Input Date: _____ Inspector: R. Scott Hoffman

Type of Inspection (check only one):

- CS ☐ Comprehensive inspection, sample taken (I & E Manual's Class 3 inspection)
CE ☒ Comprehensive inspection, no sample taken (I & E Manual's Class 3 inspection)
AI ☐ Abbreviated inspection (I & E Manual's Class 2 inspection)
CP ☐ Inspection or investigation in response to a complaint

INSPECTION DATA (Check all that apply)

CO ☒ Facility in compliance

NCO ☐ Facility not in compliance

- NOCP ☐ No construction permit
CTOP ☐ Certified operator required, but not employed
ELV ☐ Facility not meeting effluent limits based on DMRs or recent sampling
BYP ☐ Evidence of bypassing at facility or in collection system
NOLA ☐ Class I facility is operating without the required LOA/permit
NOPT ☐ Facility is discharging without a permit (includes land application facilities)
SCV ☐ Schedule of Compliance not being met
REV ☐ Reporting (e.g. DMR) or other standard conditions not being met
SDV ☐ Sludge disposal standard violation
SIC ☐ Sludge or solids were observed in creek or around outfall
SOP ☐ Stream has other observable problems due to this discharge
SWOP ☐ No stormwater outfalls permitted

- HBF ☐ Holding basin is within one foot of overflow from a no-discharge system
LL ☐ Lagoon is leaking based on geologic evaluation or water balance information
LAV ☐ Wastewater irrigation problems
SDP ☐ Sludge disposal problems
PTV ☐ Pretreatment problems
OMP ☐ Operation and maintenance problems
SNO ☐ Stream not observed during inspection
OT ☐ Other (specify)

COMPLIANCE TRACKING (Complete all that apply)

(year / month / day)

- NOVR1 ☐ Notice of Violation issued on _____ / _____ / _____
RRER2 ☐ Facility owner directed to submit DMRs, engineering report, plans and specs., construction permit, etc. by: _____ / _____ / _____
FRCR3 ☐ Facility owner directed to return to compliance by _____ / _____ / _____
OTRB4 ☐ Other; describe below; response date is: _____ / _____ / _____
VIR5 ☐ Follow-up visit/inspection scheduled for: _____ / _____ / _____

Franklin County (WP)
AmerenUE Labadie Power Plant
MO-0004812



Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

March 7, 2008

Mr. Michael J. Tomasovic, Environmental Safety & Health
Ameren Services/AmerenUE Labadie Power Plant
One Ameren Plaza
1901 Chouteau Avenue
PO Box 66149, MC 602
St. Louis, MO 63166-6149

Dear Mr. Tomasovic:

On February 20, 2008, Mr. Scott Hoffman of my staff conducted an inspection of AmerenUE Labadie Power Plant's wastewater treatment facility, stormwater and cooling water discharges located at 226 Labadie Power Plant Road, Labadie, Missouri. The inspection was conducted to assess compliance with state and federal water pollution laws and regulations, under authority provided by Missouri Clean Water Law and 10 CSR 20-6.010(8)(A)5 of the Missouri Clean Water Commission Regulations.

This facility was found to be in compliance with the Missouri Clean Water laws and Missouri Clean Water Commission Regulations. The site was well maintained and operated. The attached checklist documents the detailed results of this inspection. Because no violations were observed, a response to this report is **not** required at this time.

If you have any questions or comments, please contact **Scott Hoffman** at (314) 416-2960. Correspondence should be addressed to **Scott Hoffman** at the St. Louis Regional Office, 7545 South Lindbergh Boulevard, Suite 210, St. Louis, Missouri 63125.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Mike Struckhoff
Regional Director

MS/RSH/sb

Enclosures

✓c: Catherine Hodges, Water Pollution Control Branch-Enforcement

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WATER PROTECTION PROGRAM

WENF Rec'd APR 09 2008

REPORT ON INSPECTION

AmerenUE-Labadie Power Plant
226 Labadie Power Plant Road
Labadie, MO 63055
NPDES Permit #MO-0004812

INTRODUCTION:

On February 20, 2008, Mr. Scott Hoffman of the St. Louis Regional Office conducted an inspection of the wastewater, stormwater, and cooling water discharges from the AmerenUE-Labadie Power Plant to determine compliance with federal and state water pollution standards and regulations. Mr. Hoffman was accompanied on the inspection by Mr. Tom See, Safety Supervisor; and Mr. Michael Tomasovic, Environmental Safety & Health; and Mr. Michael J. Smallwood, Senior Engineer, Environmental Health & Safety; all from AmerenUE Services.

The inspection included a review of our department files and Discharge Monitoring Reports (DMRs) from the facility to assess compliance status with the Facility's State (Water) Operating Permit. Paperwork and reports reviewed were from the period January –December 2007. The facility's operating permit expired in March 1999 and a renewal application was submitted to the department as required at that time. The final draft of a new operating permit for this facility was put out for public comment in December 1999, and is awaiting final approval/issuance from the Water Pollution Control Program in Jefferson City, and EPA Region VII.

FINDINGS AND COMMENTS:

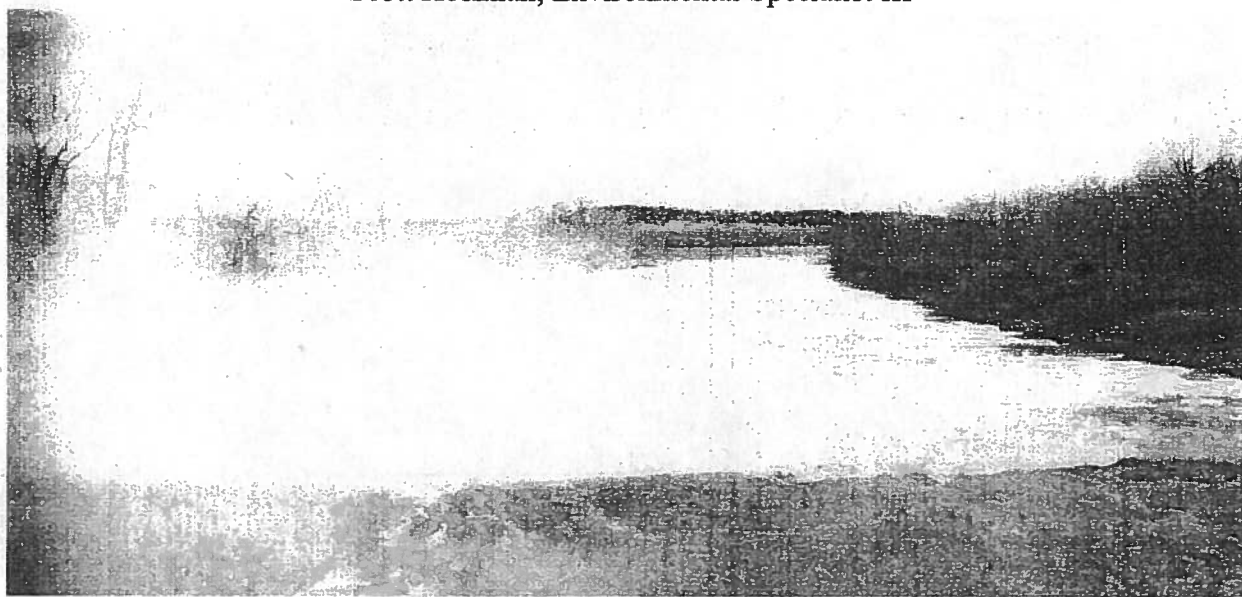
DMRs for the ash pond discharge (Outfall 002) indicated that the effluent was in compliance with permit limits and was observed to be clear. No visible adverse effects on the receiving stream were observed.

DMRs for the extended aeration wastewater treatment facility (Outfall 002A) showed that the effluent from this discharge was also in compliance with permit limits for the period reviewed. The effluent is discharged into the ash pond prior to being discharged into the receiving stream. At the time of the inspection, the mixed liquor was light brown and all blowers appeared to be operating. The effluent was clear with no malodor.

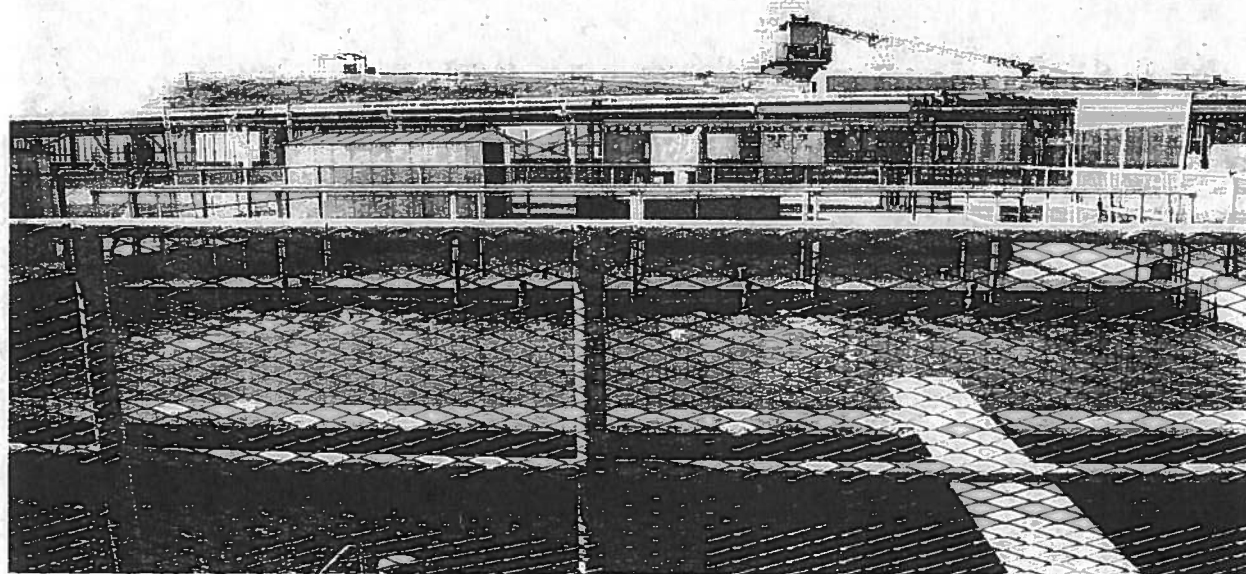
Per Special Condition #18 of the facility's new (draft) operating permit, monitoring for stormwater discharges from Outfalls #003, 004, 005, 006, &007 are waived for this permit cycle as long as AmerenUE uses Best Management Practices (BMPs) on these outfalls. If problems occur, monitoring will be re-established by the department. Per the draft permit, AmerenUE will conduct periodic inspections of these outfalls to determine effectiveness of the BMPs.

RECOMMENDATIONS:

None.



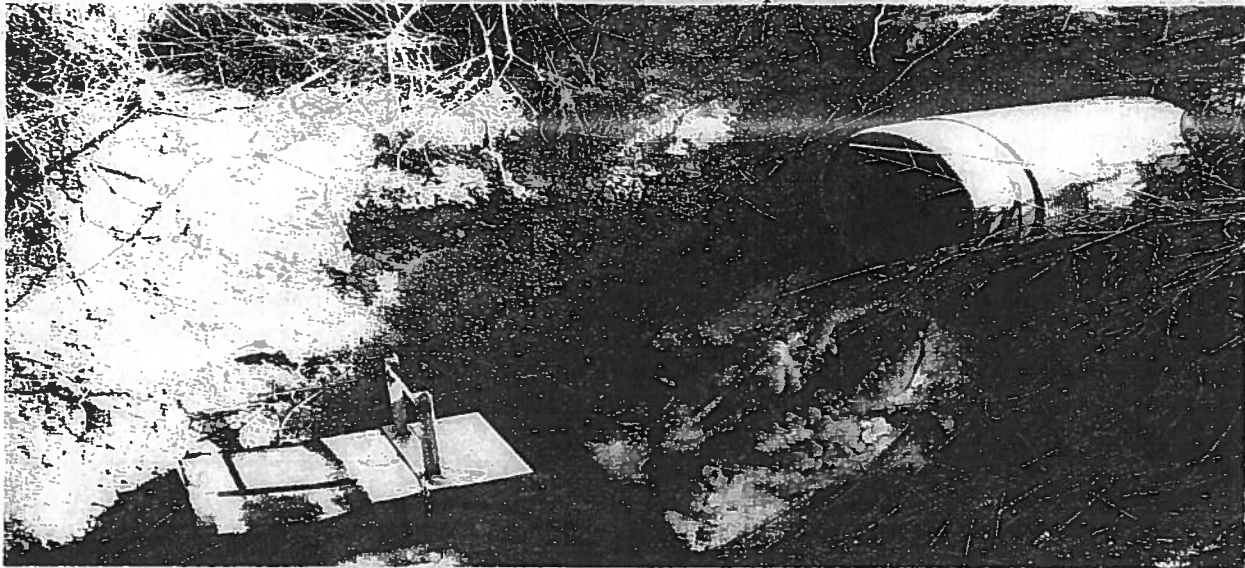
Outfall #001, Non-contact Cooling Water



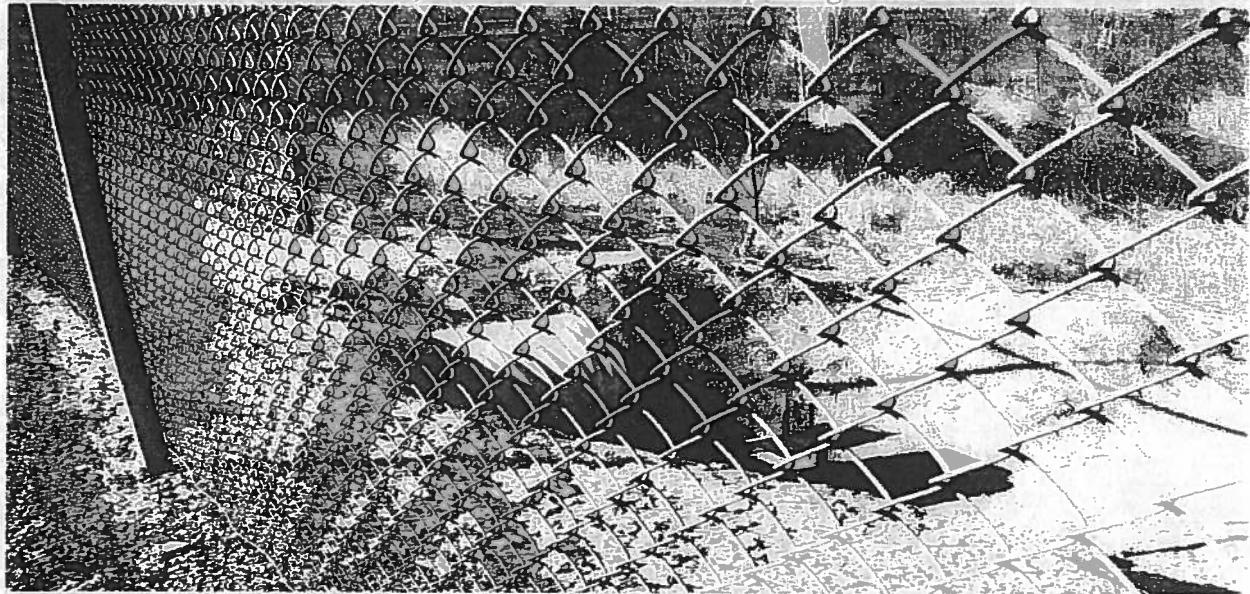
Outfall #002A, Extended aeration wastewater plant that discharges into ash pond.



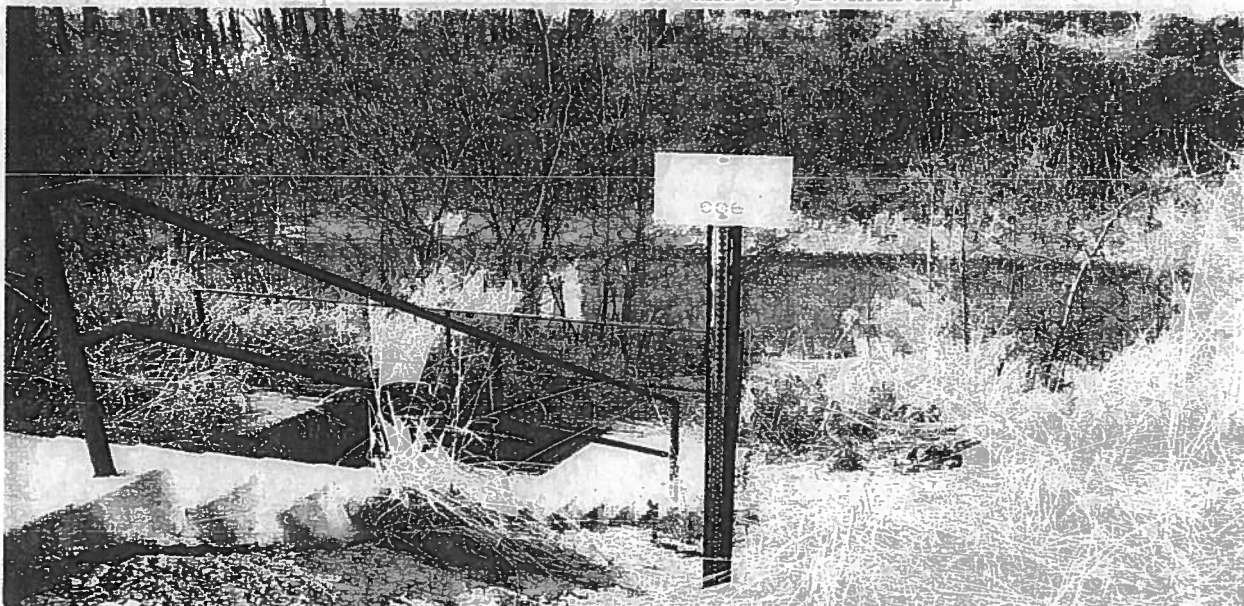
Outfall # 002, discharge from ash pond.



Outfall #003, storm water runoff from parking areas/drives.



Representative of outfalls #004 and #005, 24 inch cmp.



Representative of outfalls #006 and #007, 18 inch cmp.

MISSOURI DEPARTMENT OF NATURAL RESOURCES
INSPECTION REPORT – DOMESTIC WASTE
WATER POLLUTION CONTROL FACILITIES

WQIS INPUT DATE

PERMIT NO. MO-0004812	FACILITY NAME AmerenUE Labadie Power Plant	COUNTY Franklin	REGION SLRO	
RIVER REACH NO. 10300200-130002	PERSON(S) CONTACTED Michael J. Tomasovic	INSPECTION DATE February 20, 2008		
TYPE OF FACILITY ext aeration	SAMPLE COLLECTED NO	NA = NOT APPLICABLE S = SATISFACTORY U = UNSATISFACTORY		
Section	Applicable Categories	Item	U	Remarks
Facility Control	Proper continuing authority	01	S	
	Certified operator required but not employed *	02	S	
Permitting	Facility discharging without a permit*	03	S	permit on-hold per WPCP and EPA Region VII
	Discharge monitoring reports submitted*	05	S	
	Compliance with effluent limitations*	06	S	
	Compliance with special conditions*	07	S	
	Operating without a permit*	10	S	
Appearance of Effluent and Receiving Stream	Effluent clear and free of visible solids including stormwater	11	S	
	Receiving stream free from sludge or solids deposits*	12	S	
	Receiving stream free from scum, floating debris, unsightly color or offensive odor*	13	S	
Security Access	Warning signs posted on all approaches to the facility	14	S	
	Facility fenced & locked gate	15	S	
	All weather road maintained*	16	S	
Laboratory Testing	Required effluent testing performed & by approved methods	17	S	
	Required operational control testing performed	18	S	
	Which of the following tests is performed regularly √ MLSS √ Settleability √ Dissolved Oxygen			
Bypasses	Bypasses prevented*	19	S	
	All bypasses reported	20	S	
Clarifiers Primary & Secondary	Scum removal equipment operable and adequate	28	S	
	Scum accumulation is minimal	29	S	
	Short circuiting is prevented	30	S	
	No signs of rising sludge	31	S	
	Sludge removal equipment operable	32	S	
	Proper baffles installed	33	S	
	Weirs level and clean	34	S	
	Hydraulic and organic loading acceptable	35	S	
	Frequency of sludge removal adequate	36	S	
Aeration (in mechanical plants or lagoons)	Adequate/uniform mixing provided	41	S	light brown.
	Tank or lagoon free of dead spots	42	S	
	Return activated sludge pumps operating properly	43	S	
	Appearance of activated sludge acceptable	44	S	
	Hydraulic and organic loading acceptable	45	S	
	Scum and foaming kept to a minimum	46	S	
	Equipment in good repair (blowers, piping, etc.)	47	S	

APPENDIX 7
DATA INPUT SHEET FOR WQIS INSPECTIONS

Facility ID:		
Facility Name: AmerenUE Labadie Power Plant		Permit Number: MO-0004812
Outfall(s): 001, 002, 002A, 003, 004, 005, 006, and 007		
Legal Description: 1/4, 1/4, 1/4, Sec.18, T44N, R2E		River Reach No: 10300200-130002
City Name: Labadie	County: Franklin	ROP: SLRO
Inspection Date: February 20, 2008	WQIS Input Date:	Inspector: Scott Hoffman

Type of Inspection (check only one):

CS	<input type="checkbox"/>	Comprehensive inspection, sample taken (I & E Manual's Class 3 inspection)
CE	<input checked="" type="checkbox"/>	Comprehensive inspection, no sample taken (I & E Manual's Class 3 inspection)
AI	<input type="checkbox"/>	Abbreviated inspection (I & E Manual's Class 2 inspection)
CP	<input type="checkbox"/>	Inspection or investigation in response to a complaint

INSPECTION DATA (Check all that apply)

CO	<input checked="" type="checkbox"/>	Facility in compliance
NCO	<input type="checkbox"/>	Facility not in compliance

NOCP	<input type="checkbox"/>	No construction permit
CTOP	<input type="checkbox"/>	Certified operator required, but not employed
ELV	<input type="checkbox"/>	Facility not meeting effluent limits based on DMRs or recent sampling
BYP	<input type="checkbox"/>	Evidence of bypassing at facility or in collection system
NOLA	<input type="checkbox"/>	Class I facility is operating without the required LOA/permit
NOPT	<input type="checkbox"/>	Facility is discharging without a permit (includes land application facilities)
SCV	<input type="checkbox"/>	Schedule of Compliance not being met
REV	<input type="checkbox"/>	Reporting (e.g. DMR) or other standard conditions not being met
SDV	<input type="checkbox"/>	Sludge disposal standard violation
SIC	<input type="checkbox"/>	Sludge or solids were observed in creek or around outfall
SOP	<input type="checkbox"/>	Stream has other observable problems due to this discharge
SWOP	<input type="checkbox"/>	No stormwater outfalls permitted

HBFB	<input type="checkbox"/>	Holding basin is within one foot of overflow from a no-discharge system
LL	<input type="checkbox"/>	Lagoon is leaking based on geologic evaluation or water balance information
LAV	<input type="checkbox"/>	Wastewater irrigation problems
SDP	<input type="checkbox"/>	Sludge disposal problems
PTV	<input type="checkbox"/>	Pretreatment problems
OMP	<input type="checkbox"/>	Operation and maintenance problems
SNO	<input type="checkbox"/>	Stream not observed during inspection
OT	<input type="checkbox"/>	Other (specify)

COMPLIANCE TRACKING (Complete all that apply)

(year / month / day)

NOVR1	<input type="checkbox"/>	Notice of Violation issued on	
RRER2	<input type="checkbox"/>	Facility owner directed to submit DMRs, engineering report, plans and specs., construction permit, etc. by:	
FRRCR3	<input type="checkbox"/>	Facility owner directed to return to compliance by	
OTRR4	<input type="checkbox"/>	Other; describe below; response date is:	
VIR5	<input type="checkbox"/>	Follow-up visit/inspection scheduled for:	
WPCP - Rev. 12/15/93			